

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
PETER ROMANO a/k/a "Pietro"	:	<div>VIOLATIONS: 18 U.S.C. § 844(i) (Malicious destruction of a building by fire - 1 count); 18 U.S.C. § 844(h) (Use of fire to commit another federal offense - 1 count); 18 U.S.C. § 1341 (Mail fraud - 4 counts) 18 U.S.C. § 2 (Aiding and abetting)</div>

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On March 5, 1997, "S.R.," an individual known to the grand jury, incorporated S.C.P.J., Inc., under the laws of the Commonwealth of Pennsylvania. The business traded as Romano's Pizza and was located in the Salem 2 Shopping Complex at 3665 Hulmeville Road in Bensalem, Pennsylvania. S.C.P.J., Inc. replaced Devito's Pizzeria V, Inc., which had operated from the same location. Devito's assets were transferred to S.C.P.J., Inc.

2. S.R. was the President, Treasurer and Secretary of S.C.P.J., Inc. Romano's Pizza was a family operated business. Defendant PETER ROMANO is the son of S.R. Both resided at the same address.

3. Romano's Pizza was housed in a building that was used in an activity affecting interstate commerce. Romano's Pizza was a restaurant that bought goods and supplies

outside of Pennsylvania for use in its business.

4. On or about July 22, 1998, at Bensalem, in the Eastern District of Pennsylvania, defendant

PETER ROMANO,  
a/k/a "Pietro,"

maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire, a building, and equipment contained therein, used in interstate commerce and in activities affecting interstate commerce, that is, Romano's Pizza located at 3665 Hulmeville Road in Bensalem, Pennsylvania.

In violation of Title 18, United States Code, Section 844(i).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through three of Count One are realleged here.
2. On or about July 22, 1998, at Bensalem, in the Eastern District of

Pennsylvania, defendant

PETER ROMANO,  
a/k/a "Pietro,"

used fire to damage and destroy a building, and did so in order to commit a felony which may be prosecuted in a court of the United States, that is, mail fraud as described in Counts Three through Six of this indictment.

In violation of Title 18, United States Code, Section 844(h).

COUNTS THREE THROUGH SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through three of Count One are realleged here.

2. On or about January 21, 1998, S.R., with the help of defendant PETER ROMANO, purchased insurance from the Zurich and Maryland Insurance Group through the Earl J. McCoy Agency, Inc., located in Hamilton, New Jersey. The policy covered, among other things, the contents and business interruption.

3. On or about July 20, 1998, S.R. made an installment payment of \$237 towards Romano's Pizza's annual insurance premium.

4. From in or about July 1998, and continuing thereafter up to and including September 21, 1998, defendant

PETER ROMANO.  
a/k/a "Pietro,"

devised and intended to devise a scheme to defraud and to obtain money and property, by means of false and fraudulent pretenses, representations and promises, from the Zurich and Maryland Insurance Group.

5. On or about July 22, 1998, defendant PETER ROMANO deliberately set fire, with the use of an accelerant, to Romano's Pizza in order for his family to obtain the proceeds from the insurance policy.

6. On or about July 27, 1998, S.R. contacted a representative of the Seleznov Adjustment Bureau, a Public Adjustment Company, and retained their services for the purpose of initiating an insurance claim to collect the proceeds on the July 22, 1998 fire.

7. On or about August 7, 1998, S.R., for the purpose of

collecting insurance proceeds for the damage done by the fire at Romano's Pizza, caused the representative of the Seleznov Adjustment Bureau to forward to the Zurich and Maryland Insurance Group and Advance Sworn Statement in Proof of Loss, executed by S.R.

8. S.R. attempted to collect approximately \$106,000 for loss and damage to Romano's Pizza as a result of the July 22, 1998 fire.

9. On or about the dates stated below, defendant

PETER ROMANO,  
a/k/a "Pietro,"

and other persons known and unknown to the grand jury, for the purpose of executing this scheme and attempting to do so, knowingly caused to be delivered by United States mail, according to the directions thereon, the items described below:

<u>Count</u>	<u>Date</u>	<u>Description</u>
Three	On or about August 6, 1998	Letter enclosing pictures of the fire loss at Romano's Pizza from Patrick E. Corrigan of Seleznov Adjustment Bureau to Paul Hagan, the adjuster for the Zurich and Maryland Insurance Group, at 502 Darby Road, Havertown, PA 19083
Four	On or about August 10, 1998	Letter enclosing Advance Sworn Statement in Proof of Loss, signed by S.R., from Patrick E. Corrigan of Seleznov Adjustment Bureau to Paul Hagan, the adjuster for the Zurich and Maryland Insurance Group, at 502 Darby Road, Havertown, PA 19083
Five	On or about August 19, 1998	Letter enclosing a partial Contents Schedule of Claim from Patrick E. Corrigan of Seleznov Adjustment Bureau to Paul Hagan, the adjuster for the Zurich and Maryland Insurance Group, at 502 Darby Road, Havertown, PA 19083

Six

On or about  
September 21, 1998

Letter enclosing additional Schedule of  
Claim for equipment from Patrick E.  
Corrigan of Seleznov Adjustment Bureau  
to Paul Hagan, the adjuster for the Zurich  
and Maryland Insurance Group, at 502  
Darby Road, Havertown, PA 19083

All in violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL:

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GRAND JURY FOREPERSON

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PATRICK L. MEEHAN  
*United States Attorney*